

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MARYLAND**

FILED
DISTRICT COURT
DISTRICT OF MARYLAND
2017 MAY -9 PM 3:20

UNITED STATES OF AMERICA

v.

MARTIN ROBERT HALL,

Defendant.

CRIMINAL NO. JFM-16-0469

(Transportation of Child Pornography,
18 U.S.C. § 2252(a)(1); Possession of
Child Pornography, 18 U.S.C.
§ 2252A(a)(5)(B) & (b)(2); Production of
Child Pornography With Intent to
Transport to the United States, 18 U.S.C.
§ 2251(c), (2)(A); Production of Child
Pornography Transported to the United
States, 18 U.S.C. § 2251(c)(1), (2)(B), Sex
Tourism, 18 U.S.C. § 2423(c); Forfeiture,
18 U.S.C. §§ 2253, 2428)

SUPERSEDING INDICTMENT

COUNT ONE

(Transportation of Child Pornography)

The Grand Jury for the District of Maryland charges that:

On or about August 10, 2016, in the District of Maryland, the defendant,

MARTIN ROBERT HALL,

did knowingly transport and ship using any means and facility of interstate and foreign commerce and in and affecting interstate and foreign commerce, by any means, including by computer and mails, any visual depiction, the production of which involved the use of a minor engaged in sexually explicit conduct, as defined in Title 18, United States Code, Section 2256(2), and such depiction being of such conduct, that is, the defendant knowingly transported a series of 7 image files, which depict Jane Doe, a minor female, partially naked, and three of which are focused on Jane Doe's exposed genitals.

18 U.S.C. §§ 2252(a)(1) & 2256
18 U.S.C. § 2

COUNT TWO
(Possession of Child Pornography)

The Grand Jury for the District of Maryland further charges that:

On or about September 7, 2016, in the District of Maryland, the defendant,

MARTIN ROBERT HALL,

did knowingly possess any material that contained one or more images of child pornography, as defined in Title 18, United States Code, Section 2256(8)(A), which images had been mailed, shipped, and transported using any means and facility of interstate and foreign commerce and in and affecting interstate and foreign commerce by any means, including by computer, and which were produced using materials that had been mailed, shipped, and transported in and affecting interstate and foreign commerce by any means, including by computer, that is, a Western Digital My Passport external hard drive, s/n: WXL1E92KUJR1, made in Malaysia, which contained one or more visual depictions of prepubescent minors engaged in sexually explicit conduct.

18 U.S.C. §§ 2252A(a)(5)(B) & 2256
18 U.S.C. § 2

COUNT THREE

(Production of Child Pornography with Intent to Transport to the U.S.)

The Grand Jury for the District of Maryland further charges that:

From on or about July 25, 2016 through on or about August 10, 2016, in the District of Maryland and elsewhere, the defendant,

MARTIN ROBERT HALL,

knowingly attempted to and did employ, use, persuade, induce, entice, and coerce a minor to engage in any sexually explicit conduct as defined in Title 18, United States Code, Section 2256(2), outside of the United States, for the purpose of producing a visual depiction of such conduct, and the defendant intended such visual depiction to be transported to the United States, by any means, including by using any means or facility of interstate or foreign commerce or mail, that is, a series of 7 image files, which depict Jane Doe, a minor female, partially naked, and three of which are focused on Jane Doe's exposed genitals, said images having been produced in the Philippines.

18 U.S.C. § 2251(c)(1), (c)(2)(A)

18 U.S.C. § 2

COUNT FOUR

(Production of Child Pornography Transported to the U.S.)

The Grand Jury for the District of Maryland further charges that:

From on or about July 25, 2016 through on or about August 10, 2016, in the District of Maryland and elsewhere, the defendant,

MARTIN ROBERT HALL,

knowingly attempted to and did employ, use, persuade, induce, entice, and coerce a minor to engage in any sexually explicit conduct as defined in Title 18, United States Code, Section 2256(2), outside of the United States, for the purpose of producing a visual depiction of such conduct, and did transport such visual depiction to the United States, by any means, including by using any means and facility of interstate and foreign commerce and by mail, that is, a series of 7 image files, produced in the Philippines, which depict Jane Doe, a minor female, partially naked, and three of which are focused on Jane Doe's exposed genitals.

18 U.S.C. § 2251(c)(1), (c)(2)(B)

18 U.S.C. § 2

COUNT FIVE
(Sex Tourism)

The Grand Jury for the District of Maryland further charges that:

From in or about April 2016 through on or about August 10, 2016, in the District of Maryland and elsewhere, the defendant,

MARTIN ROBERT HALL,

a United States citizen, traveled in foreign commerce, from the state of Maryland to the Philippines, and engaged in any illicit sexual conduct as defined in Title 18, United States Code, Sections 2423(f), with another person, that is, Jane Doe, a person under 18 years of age.

18 U.S.C. § 2423(c)

18 U.S.C. § 2

FORFEITURE

The Grand Jury for the District of Maryland further charges that:

1. The allegations of Counts One through Five of this Superseding Indictment are incorporated here.
2. As a result of the offenses set forth in Counts One through Five of the Superseding Indictment in this case, the defendant,


MARTIN ROBERT HALL,

shall forfeit to the United States his interest in all property, real and personal, that was used and intended to be used to commit and to promote the commission of offenses in Counts One through Five, and any property traceable to such property, including but not limited to the following:

- a. Western Digital My Passport external hard drive, s/n: WXL1E92KUJR1, made in Malaysia;
- b. Cannon EOS Rebel T2i, Serial Numbers 0923402788 and VA0840546, made in Japan, with a 32 GB PNY Professional SDHC card, made in Korea.

as well as any property used or intended to be used to commit or to promote the commission of such offense or any property traceable to such property.

18 U.S.C. §§ 2253, 2428


Stephen M. Schenning
Acting United States Attorney

SIGNATURE REDACTED

Foreperson
Date: May 9, 2017